

March 22, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/CN-21-140

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Exemption Request Petition for the Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project.

The Petition was filed on behalf of Minnesota Power on February 26, 2021 by:

David R. Moeller
Senior Attorney and Director of Regulatory Compliance
30 West Superior Street
Duluth, MN, 55802

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the Applicant's proposed exemption request, with a modification**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/CN-21-140

I. INTRODUCTION

On February 26, 2021 Minnesota Power (MP or the Applicant) filed a *Notice Plan Petition for the Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project* (Notice Petition). The Notice Petition provided the Applicant's proposed Notice Plan to communicate its intent to construct a 115 kilovolt (kV) transmission line connecting the existing Hilltop Substation, located in southwest Duluth, and the Ridgeview Substation, located in the northeast portion of Duluth; an approximately one-mile long extension of the existing Hilltop 230 kV Tap to the Arrowhead substation; expansion and transmission line reconfigurations at the existing Hilltop and Ridgeview substations; and associated upgrades at the existing Haines Road and Arrowhead Substations. The Minnesota Public Utilities Commission (Commission) has not yet ruled on the Notice Petition.

Also, on February 26, 2021 MP filed an *Exemption Request Petition for the Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project* (Exemption Petition) in order to obtain exemptions from certain data requirements of Minnesota Rules part 7849. Below are the Comments of the Minnesota Department of Commerce, Division of Energy Resources, Energy Regulation and Planning (Department) on the Notice Petition.

II. DEPARTMENT ANALYSIS

A. BACKGROUND

The Applicant proposes to upgrade the Duluth Loop, a network of 115 kV transmission lines and substations which form two parallel connections between the Arrowhead 230/115 kV Substation (the main Duluth area transmission source of power and system support), and the North Shore. According to MP the project is required to provide reliable service to Duluth and will replace the energy and system support from local coal-fired baseload generators that are closing on the North Shore. The Company states that the project is necessary to address voltage stability concerns, relieve transmission line overloads, and enhance reliability of the Duluth-area transmission system due to the closure of the North Shore coal-fired baseload generators. As listed in the Exemption petition, the proposed project includes:

- a 10 mile long 115 kilovolt (kV) transmission line connecting the existing Hilltop Substation, located in southwest Duluth, and the Ridgeview Substation, located in the northeast portion of Duluth;

- an approximately one-mile long extension of the existing Hilltop 230 kV Tap to the Arrowhead Substation;
- expansion and transmission line reconfigurations at the existing Hilltop and Ridgeview substations; and
- associated upgrades at the existing Haines Road and Arrowhead Substations.

Minnesota Statutes §216B.2421, subd. 2 (3) defines a large energy facility (LEF) as “any high voltage transmission line with a capacity of 100 kilovolts or more with more than ten miles of its length in Minnesota or that crosses a state line.” In turn, Minnesota Statutes §216B.243, subd. 2 states “[n]o large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the Commission.” Since the project calls for 10 miles of transmission line construction with a capability of operating at 115 kV, the Department concludes that the proposed project qualifies as a LEF and a Certificate of Need (CN) is required. Minnesota Rules part 7849 includes the filing requirements for a CN for an electric transmission facility.

The Exemption Petition states that the proposed 115 kV lines will:

- resolve severe voltage stability concerns;
- relieve transmission line overloads that occur during outages impacting several substations; and
- enhance the reliability of Duluth-Area transmission sources.

B. APPLICANT’S REQUEST

In the Exemption Petition, the Applicant requests exemption from providing data relevant to the following portions of Minnesota Rules:

- 7849.0260, subp. A(3) and C(6);
- 7849.0270, subps. 1, System Wide Data;
- 7849.0270, subps. 2(A) and 2(B), Customer Class Information;
- 7849.0270, subp. 2(C) and 2(D), System Demand and Peak Demand;
- 7849.0270, subp. 2(E), System Revenue Requirements;
- 7849.0270, subp. 2(F), Weekly Load Factor;
- 7849.0270, subps. 3-6, Forecast Methodology, Data Base Assumptions, and Coordination of Forecasts;
- 7849.0280, System Capacity;
- 7849.0290, Conservation; and
- 7849.0300, Consequences of Delay and 7849.0340, Alternative of No Facility.

Minnesota Rules 7849.0200, subp. 6 states:

Before submitting an application, a person is exempted from any data requirement of this chapter if the person (1) requests an exemption from specified rules, in writing to the commission and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document.

The Department examines each specific exemption request separately. The required criterion is whether the Applicant has shown that “the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document” as noted above.

C. ANALYSIS OF EXEMPTION REQUESTS

1. Minnesota Rules 7849.0260, subp. A(3) and C(6)

These rules require an applicant to provide estimated “losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” Instead, the Applicant proposed to supply system loss information in lieu of line specific losses.

The Department agrees that line losses for the system are more relevant to the analysis than line losses for individual lines. The Department notes that, to make the proper decisions in a societal framework, it is necessary to know what happens to system losses when a line is added. To count only the losses on the line in question might lead to the selection of one alternative because it has lower losses on that line but has higher system line losses; therefore selection of such an alternative would force the system to produce more energy than some other alternative. Thus, the proposal to use data for the system as a whole in this proceeding is appropriate.

In summary, the Department recommends that the Commission approve the Applicant’s proposed exemption to Minnesota Rules 7849.0260 A(3) and C(6) conditioned upon the provision of the proposed alternative data.

2. Minnesota Rules 7849.0270, subp. 1

This rule requires an applicant to provide information regarding peak demand and annual consumption for the applicant’s entire system. The Applicant requests this exemption because the proposed facility is designed to serve customers in the local area rather than the Applicant’s system. Instead, the Applicant proposes to provide demand data supporting the need in the affected area.

The Department agrees that the data the Applicant proposes to provide, “historical substation load data for the Project area substations,” is the appropriate data regarding the need to address reliability for the Duluth Loop. Information specific to the load area is more relevant to the claimed need than system-wide information.

In summary, the Department recommends that the Commission approve the Applicant’s proposed exemption to Minnesota Rules 7849.0270, subp. 1 and 2 conditioned upon the provision of the proposed alternative data.

3. Minnesota Rules 7849.0270, subps. 2(A) and 2(B)

These rules require an applicant to predict the number of customers and the amount of energy consumed annually by nine classes of customers. These requirements were crafted to examine the construction of new transmission lines to connect new sources of electricity to new sources of demand. MP states that energy consumption data is not relevant to establishing the need for the proposed transmission line, as it must be sized for the peak energy demand, not annual demand. The Applicants requested an exemption to Minnesota Rules 7849.0270, subps. 2(a) and 2(b), proposing to instead provide data in the form of local substation load data and annual forecast report information.

The Department agrees that the methodology that the Applicants propose to use is appropriate and that the annual customer and energy consumption information is not relevant in this case. The Department agrees that the Applicants proposed substitute data is reasonable.

In summary, the Department recommends that the Commission approve the Applicant’s proposed exemption to Minnesota Rules 7849.0270, subps. 2(A) and 2(B), conditioned upon the provision of local substation load data and annual forecast report information.

4. Minnesota Rules 7849.0270, subp. 2(C) and 2(D)

Minnesota Rule 7849.0270, subp. 2(C) requires an applicant to estimate the demand for power in the applicant’s system at the time of the annual system peak demand, provided by customer class, while Minnesota Rule 7849.0270, subp. 2(D) calls for monthly system peak demand data. The Department notes that, as discussed above, they have already requested exemptions from the system wide data requirement and the customer class data requirement. The Applicant proposed to provide data on the actual historical load for local substations and annual forecast report information.

The Department agrees that the related to the local area is more appropriate for evaluating the claimed need than annual system peak data. The proposed project is intended to address Duluth Loop specific voltage and reliability issues. Therefore, information on the local area load is more relevant to the claimed need than annual peak data for the system.

In summary, the Department recommends that the Commission approve the Applicant's proposed exemption to Minnesota Rules 7849.0270, subp. 2(C) with respect to the annual system peak demand data requirements conditioned upon the historical load data for local substations and annual forecast report information.

5. Minnesota Rules 7849.0270, subp. 2(E), System Revenue Requirements

This rule requires "the estimated annual revenue requirement per kilowatt hour for the system in current dollars" for each forecast year. The Applicant proposed to provide information on the general rate impact of the Duluth Loop Project on MP customers.

The Department agrees that the data the Applicant proposes to provide is a reasonable substitute to the system revenue data requirements. As this project is needed for reliability concerns, it is not particularly necessary for the Department's analysis. However, as the Department has noted in previous exemption request comments,¹ this information is useful to show the impact of the project to non-technical audiences, and thus the Department appricates the alternative information proposed by the Applicant.

In summary, the Department recommends that the Commission approve the Applicant's proposed exemption to Minnesota Rules 7849.0270, subp. 2(E) conditioned upon the provision of the proposed alternative data.

6. Minnesota Rules 7849.0270, subp. 2(F), Weekday Load Factor

This rule requires the Applicant to provide its average system weekday load factor for each month. The Applicants requested this exemption because they concluded that load factor is not a relevant measure when evaluating the need for a transmission facility.

The Department agrees with the Applicant that load factor is not relevant in assessing the need for the proposed project and thus recommends that the Commission approve the Applicant's proposed exemption to Minnesota Rules 7849.0270, subp. 2(F).

7. Minnesota Rules 7849.0270, subps. 3-6, Forecast Methodology

These rules require the Applicant to provide detailed information on the forecast methodology employed, identification of databases, details on the assumptions made in preparing the forecasts provided under Subpart 2 of the same rule, and a description of load forecast coordination efforts with other systems. The Applicants requested this exemption because the Project is not prompted by electrical consumption, but rather by demand during peak times. The Applicants proposed to instead provide historical load data for the Project area substations as well as its most recent annual forecast

¹ See Docket Nos. ET-2,E002/CN-06-1115, E017,E015/CN-07-1222, and ET2,E015/CN-10-973

report, which discusses forecast methodology, databases, forecast assumptions, and coordination of forecasts with other systems.

The Department agrees that the data the Applicants proposed to provide would allow the evaluation of the claimed need in the proposed load area. The proposed data is more relevant given the Applicant's stated reasons for the need for the proposed Duluth Loop Project.

In summary, the Department recommends that the Commission approve the Applicant's proposed exemption to Minnesota Rules 7849.0270, subps. 3-5 conditioned upon the provision of the proposed alternative data.

8. Minnesota Rules 7849.0280, System Capacity Information

This rule requires the applicant to provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability information. The Commission has noted in the past that much of Minn. Rule 7849.0280 pertains to electric generators.² The Applicant notes that subparts B through I of the rule apply to generators and not transmission proposals. The Applicant requests an exemption from Rule 7849.0280.

The Department agrees that information relating to the affected load area for the Project is more relevant and that aspects of the rule relating to generators are not applicable. However, the Applicant requests an exemption from the entire rule, rather than just the portions that do not apply. For instance in Docket No. ET2,E015/CN-10-973 the Commission did not grant an exemption to subpart's A, although the Commission allowed data on the "applicable load area" instead, and H. The Applicant does not provide any reason why those specific requirements should be exempted in this case, however the Department agrees that the data for subpart H appears to be more focused for generators, and does not appear applicable to the analysis of the certificate of need in this case. Therefore, the Department recommends that the Commission approve the Applicants' proposed exemption to Minnesota Rules 7849.0280 for parts B through G and I, but require the Applicant to provide data on subpart A for the applicable load area.

9. Minnesota Rules 7849.0290, Conservation Programs

This rule requires the applicant to provide conservation program information and quantification of the impact of conservation programs on forecast data. The Applicant notes that all of MP's conservation efficiency information is examined in detail in the resource planning process and all of the information requested is already contained in MP's Integrated Resources Plan and Conservation Improvement Plan filings.³ MP proposes to present a summary of those filings rather than replicate the data in the instant docket.

² Id.

³ Docket Nos. E015/RP-21-33 and E015/CIP-20-476.

The Department agrees that a summary of the relevant information is sufficient and notes the Commission has granted a similar exemption for MP in the past.⁴ Thus, the Department recommends that the Commission approve the Applicants' proposed exemption to Minnesota Rules 7849.0290 conditioned upon the provision of the proposed alternative data.

10. Minnesota Rules 7849.0300, Consequences of Delay, and 7849.0340, No-Facility Alternative

Minnesota Rule 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically based levels of demand and energy consumption. Minnesota Rule 7849.0340 requires a discussion of what the impact would be on existing generation and transmission facilities at the three levels of demand specified in part 7849.0300 for the no-build alternative. As the project is needed specifically due to peak demand issues, the Applicant requests an exemption so as to only provide data at the peak demand level.

The Department agrees with the Applicant that the proposed data, focusing on peak demand is relevant to the claimed need and that the other data is extraneous. Therefore, the Department recommends that the Commission grant the exemption to Minnesota Rules 7849.0300 and 7849.0340 requiring the Applicant to only provide the required information for the peak demand level.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve the Applicants' requests for exemption from the required data conditioned upon the provision of the proposed alternative data, with the exception of requiring the Applicant to provide data for Minnesota Rules 7849.0280 subpart A for the applicable load area.

/ja

⁴ Docket No. E015/CN-12-1163.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Exemption Comments**

Docket No. E015/CN-21-140

Dated this 22nd day of March 2021

/s/Sharon Ferguson

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